

EXHIBIT 2

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to Individual Case No.
3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**DELL'S FIRST SET OF
INTERROGATORIES TO SAMSUNG SDI
COMPANY LTD.**

PROPOUNDING PARTIES: Dell Inc. and Dell Products L.P.

RESPONDING PARTIES: Samsung SDI Company Ltd.

SET: One

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) hereby request that Defendants Samsung SDI Company, Ltd. (herein “Samsung SDI”) respond in writing, subscribed under oath, to the following interrogatories within thirty (30) days of the date of service of this request.

INSTRUCTIONS

1. You must serve a written response to the Interrogatories, and such response must be signed. In answering the interrogatories, furnish all information available to you, including information in the possession of your attorneys and all persons acting on your behalf.

2. If you contend that any information sought by the interrogatories is privileged, describe the nature of the privileged information, identify the person in possession of the requested information, and identify the grounds of the asserted privilege.

3. If you object to any portion of any Interrogatory, provide all information requested by any portion of the interrogatory to which you do not object.

4. Each Interrogatory requires full and accurate disclosure based on all available information and all documents within your possession, custody or control.

5. These Interrogatories shall be deemed continuing so as to require further and supplemental answers in accordance with the Federal Rules of Civil Procedure. If at any time after responding to these interrogatories you discover additional information that will make your responses to these interrogatories more complete or correct, supplement or correct your responses as soon as reasonably possible.

DEFINITIONS

1. The term “Agreement” includes all understandings, acknowledgements, or consensuses between two or more people to accomplish a common goal, objective or purpose. Agreements may be written or unwritten; tacit; implicit or explicit; and need not have been formalized, reduced to writing or actually carried out.

2. The terms “Communication,” “Communications” and “Communicated” mean any transfer or exchange of any information whether by written, oral, electronic or other means, including

1 but not limited to electronic mail, letters, instant or text messages, voicemail messages, facsimiles or
 2 telegrams, as well as conversations, in-person or telephonic meetings, conferences, presentations or
 3 telephone calls and any writing containing or summarizing the substance of any conversations,
 4 meetings, conferences, presentations or telephone calls. Where asked to identify a Communication,
 5 please follow the instructions set forth below in connection with the term “Identify.”

6 3. The term “CDT Conspiracy” as used herein refers to the conspiracy described in
 7 Paragraph 4(c) of Samsung SDI’s plea agreement in Case No. 3:11-CR-00162-WHA in United States
 8 District Court, Northern District of California (Dkt. No. 29) as follows:

9 During the relevant period, the defendant, through its officers and employees, including
 10 high-level personnel of the defendant, participated in a conspiracy among major CDT
 11 producers, the primary purpose of which was to fix prices, reduce output, and allocate
 12 market shares of CDTs sold in the United States and elsewhere. In furtherance of the
 13 conspiracy, the defendant, through its officers and employees, engaged in discussions and
 14 attended meetings with representatives of other major CDT producers. During these
 15 discussions and meetings, agreements were reached to fix prices, reduce output, and
 16 allocate market shares of CDTs to be sold in the United States and elsewhere.

17 4. The term “CDT Defendant(s)” includes all Defendants named in Dell’s First Amended
 18 Complaint, their parents, subsidiaries, divisions, merged or acquired predecessors, present and former
 19 officers, authorized agents or representatives, and all other Persons acting or purporting to act on
 20 behalf of the individual Defendant or its subsidiaries, divisions or predecessors, including all past or
 21 present employees. The term specifically includes: Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi
 22 America, Ltd.; Hitachi Asia, Ltd.; Hitachi Electronic Devices (USA), Inc.; Shenzhen SEG Hitachi
 23 Color Display Devices, Ltd.; Irico Group Corporation; Irico Group Electronics Co., Ltd.; Irico Display
 24 Devices Co., Ltd.; LG Electronics, Inc.; LG Electronics USA, Inc.; LG Electronics Taiwan Taipei Co.,
 25 Ltd.; LP Display International Ltd.; Mitsubishi Electric Corporation; Mitsubishi Digital Electronics
 26 America, Inc.; Mitsubishi Electric & Electronics, USA, Inc.; Koninklijke Philips Electronics N.V.;
 27 Philips Electronics North America Corporation; Philips Electronics Industries (Taiwan), Ltd.; Philips
 28 Da Amazonia Industria Electronica LTDA.; Samsung SDI America, Inc.; Samsung SDI Mexico S.A.
 De C.V.; Samsung SDI Brasil LTDA.; Shenzhen Samsung SDI Co., Ltd.; Tianjin Samsung SDI Co.,
 Ltd.; Samsung SDI (Malaysia) Sdn. Bhd.; Samtel Color Ltd.; Thai CRT Co., Ltd.; Technicolor SA;

Thompson SA; Technicolor USA, Inc.; Thompson Consumer Electronics, Inc.; Toshiba Corporation; Toshiba America Consumer Products, LLC; Toshiba America Electronic Components, Inc.; and Toshiba America Information Systems, Inc.

5. The term “CDT Co-Conspirator(s)” includes all CDT Defendants as well as the alleged Co-Conspirators listed in Paragraph 68 of Dell’s First Amended Complaint. The term specifically includes, without limitation, the following companies and their parents, subsidiaries, divisions, merged or acquired predecessors, present and former officers, authorized agents or representatives, and all other Persons acting or purporting to act on behalf of the individual Defendant or its subsidiaries, divisions or predecessors, including all past or present employees: Chunghwa Picture Tubes, Ltd.; Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.; Orion Electronic Co.; Daewoo Electronics Co., Ltd.; Daewoo-Orion Société Anonyme; P.T. Tosummit Electronic Devices Indonesia; Tatung Company of America; Toshiba Display Devices (Thailand) Co., Ltd.; and Videocon Industries, Ltd.

6. The term “Person(s)” means any individual, firm, partnership, corporation, trust, estate, cooperative, association, joint venture, sole proprietorship, or any government or governmental body, commission, department, committee, board or agency.

7. “CDT” means a specialized cathode ray tube manufactured for use in computer monitors and other products with similar technological requirements.

8. The term “CDT Product(s)” means CDTs of all sizes and the products containing them, including any nearly-finished or finished product containing a CDT.

9. The terms “Identify,” “Describe,” and “State” mean:

(a) As to a Person, to state the full name, where the person worked during the time period to which your answers pertains, the person’s current employer, and the person’s current home and business address telephone numbers;

(b) As to a Document, to describe the type of document (e.g., letter, statement, memorandum, telegram, notes of telephone conversation, etc.), its date, the identity of the sender(s) and recipient(s), and its present location and custodian, in lieu thereof, a copy of the document may be produced;

(c) As to a Communication, to state the type of communication (e.g., oral, written, computer, etc.), the date and substance of such communication, the identity of the participants, and any documents evidencing or supporting such communication.

10. The relevant time period for these requests includes the time period from January 1995 until December 2007.

11. “You,” “Your,” “Yourself,” And “Your Company” mean the individual Defendant answering these Requests as well as its parents, subsidiaries, divisions, merged or acquired predecessors, present and former officers, employees, authorized agents or representatives, and all other Persons acting or purporting to act on behalf of the individual Defendant or its subsidiaries, divisions or predecessors, including all past or present employees.

INTERROGATORIES

INTERROGATORY NO. 1:

State the full name, job title, and last known business address of each of the officers and employees of Samsung SDI who participated in the CDT Conspiracy.

INTERROGATORY NO. 2:

State the name of each major CDT producer that participated in the CDT Conspiracy with Samsung SDI.

INTERROGATORY NO. 3:

State the full name, job title, and last known business address of each officer and employee of each major CDT producer who participated in the CDT Conspiracy with Samsung SDI.

INTERROGATORY NO. 4:

State the full name, job title, and last known business address of each of the officers and employees of Samsung SDI who, in furtherance of the CDT Conspiracy, engaged in discussions and attended meetings with representatives of other major CDT producers.

INTERROGATORY NO. 5:

State the full name, job title, and last known business address of each officer and employee of each major CDT producer who, in furtherance of the CDT Conspiracy, engaged in discussions and attended

meetings with representatives of other major CDT producers.

INTERROGATORY NO. 6:

Identify any and all of Samsung SDI's customers located in the United States during the CDT Conspiracy.

INTERROGATORY NO. 7:

Identify all Documents in which one of Your officers or employees requested, instructed, suggested or referred to (a) keeping communications with other Major CDT producers secret; (b) not memorializing discussions related to CDTs; (c) the legality or illegality of communicating with other Major CDT Producers; (d) avoiding submitting CDT prices, quotes or offers in synch with other Major CDT Producers; or (e) being asked by a customer, including but not limited to Dell, about the existence of a conspiracy or anti-competitive activity related to CDTs.

INTERROGATORY NO. 8:

To the extent you responded with anything other than an unqualified admission to any of Dell's Requests for Admission Nos. 1-115 served contemporaneously herewith, please identify all facts, witnesses, and documents that support your denials.

Respectfully submitted this 27 day of September, 2013.

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC (N.D.
 Cal.)

MDL No. 1917

This Document Relates to: Individual Case
 No. 13-cv-2171 (SC)

CERTIFICATE OF SERVICE

DELL INC. AND DELL PRODUCTS L.P.,

PLAINTIFFS,

V.

HITACHI, LTD., *ET AL.*,

DEFENDANTS.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a true and correct copy of the documents listed below to be served by Email transmission on September 27, 2013 to each of the persons set forth in the attached service list.

- Dell's First Set of Interrogatories to Defendant Samsung SDI Company, Ltd.
- Dell's First Set of Requests for Production to Defendant Samsung SDI Company, Ltd.
- Dell's First Set of Requests For Admission to Defendant Samsung SDI Company, Ltd.

Dated: September 27, 2013

/s/ Debra D. Bernstein
Debra D. Bernstein, Esq.

*In re: Cathode Ray Tube (CRT) Antitrust Litigation – MDL No. 1917***SERVICE LIST**

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